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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15
16 UNITED STATES OF AMERICA,) CASE NO. CR 15-0319 RS
17 Plaintiff,)
18 v.) APPLICATION OF THE UNITED STATES FOR
19 SHAUN W. BRIDGES,) A PRELIMINARY ORDER OF FORFEITURE
20 Defendant.)
21

The United States of America, by and through the undersigned Assistant United States
Attorneys, respectfully submit this Application of the United States for Issuance of a Preliminary Order
of Forfeiture in the above-captioned case. In support thereof, the United States sets forth the following:

On June 16, 2015, defendant Shaun W. Bridges was charged by information with violations of
Title 18, United States Code, Section 1957 (Money Laundering), and Title 18, United States Code,
Section 1512(c)(2) (Obstruction of Justice). The information also sought criminal forfeiture, pursuant to
Title 18, United States Code, Section 982(a)(1) (Money Laundering Forfeiture); Title 18, United States
Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c) (Obstruction of Justice).

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1 Forfeiture) of the following, including but not limited to:

2 a. any property, real or personal, involved in any such offense, or any property traceable to such
3 property, including but not limited to a money judgment equivalent to the amount of property
 involved in the violation of 18 U.S.C. § 1957(a); and
4 b. any property, real or personal, which constitutes or is derived from proceeds traceable to the
5 offense, including but not limited to a money judgment equivalent to the amount of property
 involved in the violation of 18 U.S.C. §§ 1512(c)(2) and (2).

6 On August 31, 2015, defendant Shaun W. Bridges, pled guilty to Counts One and Two of the
7 information, namely, Title 18, United States Code, Section 1597 (Money Laundering), and Title 18,
8 United States Code, Section 1512(c)(2) (Obstruction of Justice), and agreed to forfeit, to the United
9 States, the following property:

10 a. \$165,529.88 from defendants Fidelity Brokerage Account, held in the name of Quantum
 Investments;
11 b. \$306,000 held in trust by defendants attorney of record; and
12 c. \$4,745.92 from defendants PNC Bank Account, jointly held in the name of Shawn Bridges
 and a person known to the parties,

14 (hereinafter "subject property").

15 Defendant further admitted that the subject property constitutes money involved in money
16 laundering and/or proceeds from obstruction of justice and wire fraud, and thus is forfeitable to the
17 United States pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(c); Title 18,
18 United States Code, Section 982(a)(1)(A); Title 28, United States Code, Section 2461(c) and the
19 procedures outlined in Rule 32.2 of the Federal Rules of Criminal Procedure and Title 21, United States
20 Code, Section 853.

21 Defendant further agreed to pay a Money Judgment in the amount of \$651,000.00 and admitted
22 that the Money Judgment constitutes the net proceeds obtained, directly or indirectly as a result of
23 violation of Title 18, United States Code, Section 1343; Title 18, United States Code, Section 1957, and
24 Title 18, United States Code, Section 1512(c)(2), defendant further agreed that the assets identified in
25 letters (a) - (c) can be forfeited and will be used to offset the Money Judgment.

26 Rule 32.2 (b)(1) of the Federal Rules of Criminal Procedure provides that as soon as practicable
27 after entering a guilty verdict or accepting a plea of guilty or nolo contendere on any count in an

1 indictment or information with regard to which criminal forfeiture is sought, the court shall determine
2 what property is subject to forfeiture under the applicable statute. If forfeiture of specific property is
3 sought, the court shall determine whether the government has established the requisite nexus between
4 the property and the offense. If the government seeks a personal money judgment against the defendant,
5 the court shall determine the amount of money that the defendant will be ordered to pay. The court's
6 determination may be based on evidence already in the record, including any written plea agreement or,
7 if the forfeiture is contested, on evidence or information presented by the parties at a hearing after the
8 verdict or finding of guilt.

9 Pursuant to Rule 32.2(b)(2), if the court finds that property is subject to forfeiture, it shall
10 promptly enter a preliminary order of forfeiture setting forth the amount of any money judgment or
11 directing the forfeiture of specific property without regard to any third party's interest in all or part of it.
12 Determining whether a third party has such an interest shall be deferred until any third party files a claim
13 in an ancillary proceeding under Rule 32.2(c).

14 Rule 32.2(b)(3) further provides that the entry of a preliminary order of forfeiture authorizes the
15 Attorney General (or a designee) to seize the specific property subject to forfeiture; to conduct any
16 discovery the court considers proper in identifying, locating, or disposing of the property; and to
17 commence proceedings that comply with any statutes governing third-party rights. At sentencing - or at
18 any time before sentencing if the defendant consents - the order of forfeiture becomes final as to the
19 defendant and shall be made part of the sentence and included in the judgment. The court may include
20 in the order of forfeiture conditions reasonably necessary to preserve the property's value pending any
21 appeal.

22 Pursuant to his plea, the United States has established the requisite nexus between the subject
23 property and the offenses to which the defendant admitted. Accordingly, that property is subject to
24 forfeiture to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(c); Title 18,
25 United States Code, Section 982(a)(1)(A), and Title 28, United States Code, Section 2461(c).

26 Upon the issuance of a Preliminary Order of Forfeiture and pursuant to Title 21, United States
27 Code, Section 853(n), and Rule G(4)(a)(iv) of the Supplemental Rules for admiralty or Maritime Claims
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1 and Asset Forfeiture Actions, the United States will publish on www.forfeiture.gov, a government
2 website for at least thirty days, notice of this Order, notice of its intent to dispose of the property in such
3 manner as the Attorney General may direct and notice that any person, other than the defendant, having
4 or claiming a legal interest in the property must file a petition with the Court and serve a copy on
5 Kathryn Haun, Assistant United States Attorney, 450 Golden Gate Ave., Box 36055, San Francisco, CA
6 94102 and/or Arvon J. Perteet, Assistant United States Attorney, 450 Golden Gate Ave., Box 36055,
7 San Francisco, CA 94102, within thirty (30) days of the final publication of notice or of receipt of actual
8 notice, whichever is earlier. This notice shall state that the petition shall be for a hearing to adjudicate
9 the validity of the petitioner's alleged interest in the property, shall be signed by the petitioner under
10 penalty of perjury and shall set forth the nature and extent of the petitioner's right, title or interest in the
11 forfeited property and any additional facts supporting the petitioner's claim and the relief sought. The
12 United States may also, to the extent practicable, provide direct written notice to any person known to
13 have alleged an interest in the property that is the subject of the Preliminary Order of Forfeiture, as a
14 substitute for published notice as to those persons so notified.

15 WHEREFORE, the United States respectfully requests that this Court enter a Preliminary Order
16 of Forfeiture which provides for the following:

17 a. authorizes the forfeiture of the subject property to the United States and entry of a money
18 judgment in the amount of \$651,000.00;

19 b. directs the United States, through its appropriate agency, to seize the forfeited property
20 forthwith;

21 c. authorizes the government to conduct discovery in order to identify, locate or dispose of
22 property subject to forfeiture in accordance with Rule 32.2(b)(3) of the Federal Rules of Criminal
23 Procedure;

24 d. directs the United States to publish on a government website for at least thirty days,
25 notice of this Order, notice of the government's intent to dispose of the property in such manner as the
26 Attorney General may direct and provide notice that any person, other than the defendants, having or
27 claiming a legal interest in the subject property must file a petition with the Court and serve a copy on

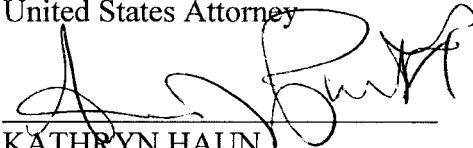
1 government counsel within thirty (30) days of the final publication of notice or of receipt of actual
2 notice, whichever is earlier; and

3 e. the Court to retain jurisdiction to enforce the Preliminary Order of Forfeiture, and to amend
4 it as necessary, pursuant to Federal Rule of Criminal Procedure 32.2(e).

5 Dated: 9/1/15

Respectfully submitted,

6 MELINDA HAAG
United States Attorney

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8 KATHRYN HAUN
9 WILLIAM FRENTZEN
10 ARVON J. PERTEET
11 Assistant United States Attorneys

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee if the Office of the United States Attorney for the Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned further certifies that he caused a copy of the following documents:

- **APPLICATION OF THE UNITED STATES FOR A PRELIMINARY ORDER OF FORFEITURE; and**
- **[PROPOSED] PRELIMINARY ORDER OF FORFEITURE**

to be served this date by U.S. first class mail delivery and certified mail delivery upon the person(s) below at the place and address which is the last known address:

Craig Denney, Esq. Snell and Wilmer 50 W. Liberty Street, Suite 510 Reno, NV 89501 (Counsel for BRIDGES)	Steven Hale Levin, Esq. Levin and Curlett LLC 201 N. Charles Street, Suite 2000 Baltimore, MD 21201 (Counsel for BRIDGES)
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 2nd day of September, 2015, at San Francisco, California.


HECTOR LOPEZ
FSA Paralegal III/AFU